1 Thomas Stipulation Bankruptcy Case # 17-17189/AMC

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Rachel Thomas, Debtor.

Nationstar Mortgage LLC dba Mr. Cooper as servicer for Wilmington Trust Company, as successor Trustee to U.S. Bank National Association, as Trustee to MASTR Alternative Loan Trust 2005-3 Mortgage Pass-Through Certificates, Series 2005-3, Moyant,

v. Rachel Thomas, Debtor,

William C. Miller, Trustee,
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER 17-17189/AMC

11 U.S.C. § 362

## STIPULATION AND ORDER

AND NOW, in consideration of the mutual promises and agreements set forth below, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, it is hereby stipulated and agreed to by and between the undersigned as follows:

- 1. Debtor has expressed an interest in selling 1218 Sandringham Road, Bala Cynwyd, PA 19004 (the "Property").
- 2. Upon receipt of an Agreement of Sale, Debtor shall file the appropriate Motion to Sell the Property.
- 3. Movant is not opposed to the sale of the Property so long as it is paid in full or an amount agreed upon by Movant to satisfy the lien.
  - 4. The sale of the Property shall occur on or before August 1, 2018
- 5. The parties agree should the Property not sell by the above referenced date that the Automatic Stay of all proceedings, as provided under 11 U.S.C. § 362, is lifted August 2,

## Case 17-17189-amc Doc 35 Filed 02/15/18 Entered 02/15/18 12:18:17 Desc Main Document Page 2 of 2

2 Thomas Stipulation Bankruptcy Case # 17-17189/AMC

2018 to allow Movant, or its successors, if any, to proceed with its rights under its loan documents for the property located at 1218 Sandringham Road, Bala Cynwyd, PA 19004; and under Rule 4001(a)(3) is not applicable and Movant, or its successors, if any, may immediately implement this order.

The parties request that this Honorable Court approve this stipulation.

2/15/18 Dated:	Kevin S. Frankel, Esquire Attorney for Movant
Dated: 2 15 12.	Kenneth E. West, Esquire Attorney for Debtor
Dated: 2-15-18	William C. Miller Trustee THEK MIWER NOODRING
AND NOW, this day of	
	BY THE COURT:
	HONORABLE ASHELY M. CHAN UNITED STATES BANKRUPTCY JUDGE